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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 Kajan Johnson and Clarence Dollaway, on behalf
of themselves and all others similarly situated,

14 Plaintiffs,
15 v.
16 Zuffa, LLC (d/b/a Ultimate Fighting Championship
and UFC) and Endeavor Group Holdings, Inc.,
17 Defendants.

18 Case No.: 2:21-cv-01189-APG-VCF

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20 PLAINTIFFS' NOTICE OF RELATED
CASES

21 (LR 42-1)

22 Plaintiffs Kajan Johnson and Clarence Dollaway (collectively, Plaintiffs), hereby submit this
Notice of Related Case as required by LR 42-1.

23 **Title and Case Number of the Related Action:**

24 • *Cung Le, et al. v. Zuffa LLC d/b/a Ultimate Fighting Championship and UFC*, Case No. 2:15-cv-
01045-RFB-BNW

25
26 **Reasons Why Assignment to a Single District Judge and Magistrate Judge is Desirable**

27 This case is similar to the class action brought by Cung Le, Nathan Quarry, Jon Fitch, Brandon
28 Vera, Luis Javier Vazquez, and Kyle Kingsbury against the UFC currently pending in this District Court.

1 See *Cung Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*, No. 2:15-cv-01045-
2 RFB-BNW (D. Nev.) (“Le”), transferred into this District on June 4, 2015.

3 Plaintiffs in *Le* brought suit on behalf of a class defined as follows in the *Le* Complaint: “All
4 persons who competed in one or more live professional UFC-promoted MMA bouts taking place or
5 broadcast in the United States during the Class Period [i.e., the period from December 16, 2010 until the
6 illicit scheme alleged herein ceases].” ECF No. 208 ¶¶39, 27(c). The *Le* plaintiffs ultimately sought
7 certification of the following class: “All persons who competed in one or more live professional UFC-
8 promoted MMA bouts taking place or broadcast in the United States from December 16, 2010, to June
9 30, 2017.” *Le*, ECF No. 518 at i.

10 Because the class period ultimately proposed by the plaintiffs in *Le* closed on June 30, 2017,
11 Plaintiffs Johnson and Dollaway bring this case on behalf of those like themselves who fought a bout
12 promoted by the UFC from July 1, 2017 to the present.

13 These matters involve virtually identical factual allegations related to the same series of events,
14 facts, and circumstances, and assert identical claims for relief. As listed in LR 42-1, these actions
15 “involve similar questions of fact and the same question of law, and their assignment to the same district
16 judge or magistrate judge is likely to effect a substantial savings of judicial effort.” Furthermore, as noted
17 in LR 42-1, “it would entail substantial duplication of labor if the actions were heard by different district
18 judges or magistrate judges.”

19 Plaintiffs request that this case be transferred to Judge Boulware and Magistrate Judge Wexler to
20 be heard together with the *Le* case.

21 Dated this 2nd day of July, 2021.

22 Respectfully Submitted,

23 KEMP JONES, LLP

24 By: /s/ Don Springmeyer

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 2nd day of July, 2021, a true and correct copy of **PLAINTIFFS'**
3 **NOTICE OF RELATED CASES** was served via the United States District Court CM/ECF system on
4 all counsel of record who have enrolled in this ECF system.

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/s/ Pamela Montgomery

An employee of Kemp Jones, LLP